

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 25-10038-PMM
Roger M. Adams and Jennifer Rae Adams aka	:	Chapter 13
Jennifer Rae Barnett	:	
<i>Debtor</i>	:	
	:	
Newrez LLC dba Shellpoint Mortgage Servicing	:	
<i>Movant</i>	:	
vs.	:	
Roger M. Adams and Jennifer Rae Adams aka	:	
Jennifer Rae Barnett	:	
<i>Debtor/Respondent</i>	:	
and	:	
Kenneth E. West, Esquire	:	
<i>Trustee/Respondent</i>	:	

**OBJECTION TO CONFIRMATION OF THE PLAN**

Newrez LLC dba Shellpoint Mortgage Servicing (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Roger M. Adams and Jennifer Rae Adams aka Jennifer Rae Barnett (“Debtor”), as follows:

1. As of the bankruptcy filing date of January 06, 2025, Movant holds a secured Claim against the Debtor’s property located at 437 Iroquois Street, Lester, PA 19029.
2. Movant is in the process of filing a Proof of Claim by the 3/17/2025 bar date, with an estimated secured claim in the amount of \$109,394.69, and estimated pre-petition arrears in the amount of \$19,292.58.
3. The Plan currently proposes payment to Movant in the amount of \$15,500.00 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

**WHEREFORE**, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Respectfully submitted,

Dated: 01/31/2025

/s/Danielle Boyle-Ebersole  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
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<i>Debtor/Respondent</i>	:
and	:
Kenneth E. West, Esquire	:
<i>Trustee/Respondent</i>	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for Newrez LLC dba Shellpoint Mortgage Servicing (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 01/31/2025:

Brad J. Sadek, Esquire  
Via Electronic Filing  
*Attorney for Debtor*

Kenneth E. West, Esquire  
Via Electronic Filing  
*Trustee*

Roger M. Adams  
Jennifer Rae Adams  
437 Iroquois Street  
Lester, PA 19029  
Via First Class Mail  
*Debtor*

Respectfully Submitted,

Date: 01/31/2025

/s/Danielle Boyle-Ebersole  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
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